

**Steven T. Wax, OSB No. 85012**  
**Federal Public Defender**  
**101 SW Main Street, Suite 1700**  
**Portland, OR 97204**  
**Tel: (503) 326-2123**  
**Fax: (503) 326-5524**  
**Email: steve\_wax@fd.org**

**Lawrence Matasar, OSB No. 74209**  
**621 SW Morrison Street, Suite 1025**  
**Portland, OR 97205**  
**Tel: (503) 222-9830**  
**Email: larry@pdxlaw.com**

**Attorneys for Defendant**

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**  
**EUGENE DIVISION**

**UNITED STATES OF AMERICA,**  
  
**Plaintiff,**  
  
**v.**

**No. CR 05-60008 HO**

**DEFENDANT'S PROPOSED JURY**  
**QUESTIONNAIRE**

**PIROUZ SEDAGHATY,**  
  
**Defendant.**

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Defendant, Pirouz Sedaghaty, by and through his attorneys, Federal Public Defender Steven T. Wax and Lawrence Matasar, respectfully moves the Court to adopt the attached juror questionnaire. Given that the jury trial date in this matter has been

scheduled for June 7, 2010, and considering the high profile nature of this prosecution with its attendant media exposure, which may affect substantive and material issues involving jury selection, Mr. Sedaghaty reserves the right to amend the questionnaire. Mr. Sedaghaty also reserves the right to move the Court to voir dire on sensitive issues identified from the questionnaire.

Respectfully submitted this 12<sup>th</sup> day of May, 2010.

/s/ Steven T. Wax  
Steven T. Wax  
Federal Public Defender

/s/ Lawrence Matasar  
Lawrence Matasar

Attorneys for Defendant

Name: \_\_\_\_\_  
 Juror #: \_\_\_\_\_

## JUROR QUESTIONNAIRE

The questions on this form are asked to help the Court and the attorneys learn about your views on issues that may be related to the case of *United States v. Pirouz Sedaghaty*. It is the first part of the process of jury selection, known as *voir dire*, which means to speak the truth. Its use will expedite the process of selecting a jury. The questions are not meant to invade your privacy. Your names and identifying information will not be made a matter of public record. Please answer the questions as honestly and completely as possible. There are no right or wrong answers; there are only truthful answers. It is important that you are completely candid as to your actual views and feelings. It is also important that your answers to the questionnaire be yours and yours alone. Do not discuss the questionnaire or your answers with anyone, including your family, court personnel, or, other prospective jurors. If you do not understand a question, say so on the questionnaire. If a question touches on an especially personal or sensitive matter, please answer "private" and you will be given the opportunity to discuss the matter in private at a later time. Write only on the front side of each page. There are extra pages at the back if you need more space to answer a question. Write "see back page" on your answer and on the back page or pages, be sure to include the question number to which you are responding.

**Please PRINT your answers in INK.**

### BACKGROUND INFORMATION

1. Gender: \_\_\_\_ Female \_\_\_\_ Male Age: \_\_\_\_
2. What is your place of birth? \_\_\_\_\_
3. In what area/neighborhood do you live? \_\_\_\_\_
4. What other places have you lived (city, state, country, if outside the United States)?  
 \_\_\_\_\_
5. Marital status:  
 \_\_\_\_ Single \_\_\_\_ Married for \_\_\_\_ years \_\_\_\_ Divorced \_\_\_\_ Separated  
 \_\_\_\_ Widowed \_\_\_\_ Living with someone
6. How far did you go in school? \_\_\_\_\_  
 Major area(s) of study: \_\_\_\_\_  
 \_\_\_\_\_  
 Degrees or certificates: \_\_\_\_\_  
 \_\_\_\_\_

7. Are you:      ☐ Employed full-time                      ☐ Retired  
                     ☐ Employed part-time                      ☐ Student  
                     ☐ Homemaker                                      ☐ Disabled & unable to work  
                     ☐ Unemployed/laid off
- a. Current occupation and employer: \_\_\_\_\_  
\_\_\_\_\_
- b. How long have you worked in your current job? \_\_\_\_\_
- c. If retired or unemployed, what was your primary vocation?  
\_\_\_\_\_
- d. If homemaker or student, please tell us what jobs outside the home (if any) you have had in the past year: \_\_\_\_\_  
\_\_\_\_\_
8. What is (was) your job title? \_\_\_\_\_
- a. What are (were) your duties on that job? \_\_\_\_\_  
\_\_\_\_\_
- b. Do (did) you supervise others in that job?  
\_\_\_\_ Yes \_\_\_\_ No      If Yes, how many? \_\_\_\_\_
9. Do you have a second job?  
\_\_\_\_ Yes \_\_\_\_ No  
If Yes, what do you do? \_\_\_\_\_
10. What other jobs have you held as an adult? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
11. Occupation of spouse/significant other: \_\_\_\_\_  
\_\_\_\_\_
12. a. What religion, if any, were you raised in? \_\_\_\_\_  
b. What religion, if any, do you currently follow? \_\_\_\_\_  
c. What religion, if any, are your children being raised with?

13. a. Do you, or your church, practice tithing as part of your religious or spiritual beliefs? \_\_\_\_ Yes \_\_\_\_ No
- b. If yes, do you regularly tithe? \_\_\_\_ Yes \_\_\_\_ No
14. What civic, social, union, professional, fraternal, political, recreational, churches, synagogues, temples, mosques, or other religious organizations do you belong to or participate in, and what offices, if any, have you held in any of these organizations? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
15. a. Have you ever donated money/goods to any charitable causes or organizations?  
\_\_\_\_ Yes \_\_\_\_ No \_\_\_\_ I am not sure  
If "NO," SKIP to Question No. 16.
- b. Have you ever contributed to a charity because you believe in its principles, even though others have criticized its activities? \_\_\_\_ Yes \_\_\_\_ No If Yes, please describe the charity or charities. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- c. Please list the causes or organizations to which you have donated money/goods or at which you have volunteered. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- d. Did any of these organizations represent to you that they provided aid to people outside the United States? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
16. What are your hobbies or spare time activities? \_\_\_\_\_  
\_\_\_\_\_

17. If you or any member of your family have had a bumper sticker, or a vanity license plate on a vehicle, please describe the language and symbols shown on the sticker(s) or vanity license plate. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
18. If you or any members of your family have ever had any signs, posters, flags, or other displays visible or posted on your property, please describe the language and symbols that were shown on the signs, posters, flags, or other display. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### MILITARY BACKGROUND

19. Have you, your spouse, parents, or children ever served in the military? Yes \_\_\_\_\_  
No \_\_\_\_\_ Branch and highest rank: \_\_\_\_\_
20. Is any member of your family serving in the military at the present time?  
\_\_\_\_\_ Yes \_\_\_\_\_ No If Yes, please explain who (relation to you), where, and duty:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
21. Have you, any children or relatives, or anyone close to you, served in the recent war in Iraq, in Desert Storm or in military operations in Afghanistan and other areas of the Middle East?
- |               |           |          |                                |
|---------------|-----------|----------|--------------------------------|
| Iraq:         | Yes _____ | No _____ | Branch and highest rank: _____ |
| Desert Storm: | Yes _____ | No _____ | Branch and highest rank: _____ |
| Afghanistan:  | Yes _____ | No _____ | Branch and highest rank: _____ |
- Other areas of the Middle East:
- Yes \_\_\_\_\_ No \_\_\_\_\_ Location: \_\_\_\_\_  
Branch and highest rank: \_\_\_\_\_
- If Yes, where is, or was that person stationed?  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
22. Were any such persons ever in a combat situation?  
Yes \_\_\_\_\_ No \_\_\_\_\_ Don't Know \_\_\_\_\_

- a. Has anyone in your family been injured or killed while serving in a combat or military zone? \_\_\_\_\_ Yes \_\_\_\_\_ No If Yes please explain who (relation to you), where, when and circumstances of injury or death: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
23. Have you, or anyone in your family, worked or volunteered in a civilian or nonmilitary government capacity anywhere in the Middle East? \_\_\_\_ Yes \_\_\_\_ No  
If Yes, please explain who (relation to you), where, when and circumstances:  
\_\_\_\_\_  
\_\_\_\_\_
24. Do you, or anyone in your family, have plans or orders to go to the Middle East, whether as a member of the military or as a civilian? \_\_\_\_ Yes \_\_\_\_ No  
If Yes, please explain who (relation to you), where, when and for what purpose(s):  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

#### **RACE AND RELIGION**

25. What is your racial/ethnic background? \_\_\_\_\_
26. When you were growing up, what was the racial and ethnic makeup of your neighborhood? \_\_\_\_\_  
If there were people of other races in your neighborhood, did you associate or play with them? Did you do so at their houses? Did you have them over to your house?  
\_\_\_\_\_  
\_\_\_\_\_
27. a. Were either of your parents born outside of the United States?  
\_\_\_\_\_ Yes \_\_\_\_\_ No  
  
If yes, please tell us who, where were they born and what year did they come to the United States? \_\_\_\_\_  
\_\_\_\_\_
- b. Were you, your spouse, your former spouse, or partner born outside of the United States? \_\_\_\_\_ Yes \_\_\_\_\_ No If yes, please tell us who, where were they born and what year did they come to the United States?  
\_\_\_\_\_
28. Have you or any member of your family ever dated someone from a different race? If yes, when? \_\_\_\_\_  
\_\_\_\_\_

29. Have you ever contributed any money to any minority-oriented charity such as the Urban League, United Negro College Fund, American Indian College Fund, etc.  
\_\_\_\_\_
30. There are many times when a situation may arise where you may feel fear of another person, perhaps based on their actions, or because of the way that they look. While it is hard to admit to it, it is something that happens to a lot of people. Has there ever been a situation when you have experienced fear of a person because of their race or where they might be from? \_\_\_\_Yes\_\_\_\_No. If yes, please explain the situation. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
31. Have you heard the phrase “racial profiling?” If yes, what does that phrase mean to you? How do you feel about it? \_\_\_\_\_  
\_\_\_\_\_
32. Do you believe it is more difficult to identify a person from a racial group that is different than yours? \_\_\_\_\_
33. Are you a member of any group or organization that limits its membership based on race, ethnic origin, or gender? \_\_\_\_\_
34. Have you ever been present when another person made a statement or remark that you believe was anti-Muslim or anti-Arab, expressed religious or ethnic insensitivity, or was disparaging of **any** particular religion or race? \_\_\_\_\_ Yes \_\_\_\_\_ No  
If yes, how did you respond? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- Did you remain silent or did you confront the person who made the remark? \_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
35. Have you, or has anyone close to you, been discriminated against in any way?  
\_\_\_\_\_ Yes, self  
\_\_\_\_\_ Yes, someone close  
\_\_\_\_\_ No  
If yes, please describe: \_\_\_\_\_  
\_\_\_\_\_
36. Have you had any training or taken any courses or seminars in: (check all that apply)  
\_\_\_\_\_ Criminal law \_\_\_\_\_ Middle Eastern Studies  
\_\_\_\_\_ Criminology \_\_\_\_\_ Religion  
\_\_\_\_\_ Terrorism \_\_\_\_\_ Islamic Law



37. Do you speak, read, write or understand Arabic or any Arabic dialect?  
Yes\_\_\_\_\_ No\_\_\_\_\_ If yes, please describe your proficiency. \_\_\_\_\_  
Any other languages: \_\_\_\_\_
38. When you hear the words "Persian," "Muslim," or "Arab," what is the first thought that comes to your mind? \_\_\_\_\_  
\_\_\_\_\_
- a. What is an Arab? \_\_\_\_\_  
\_\_\_\_\_
- b. What is a Persian? \_\_\_\_\_  
\_\_\_\_\_
39. What is your view of the Muslim or Islamic faith? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- a. How did you come to that view? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
40. Is there anything about Islamic teachings or doctrine that is personally offensive to you? \_\_\_\_\_ Yes \_\_\_\_\_ No If Yes, please explain. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
41. In what contexts have you had personal contact with people who are Muslims, or of Persian or Arab descent? (Please check all answers that apply.)  
\_\_\_\_\_ in the family  
\_\_\_\_\_ in the neighborhood  
\_\_\_\_\_ in organizations  
\_\_\_\_\_ through work/business  
\_\_\_\_\_ In place of worship  
\_\_\_\_\_ in school  
\_\_\_\_\_ none  
\_\_\_\_\_ other: \_\_\_\_\_
- a. If you work with any people who are Muslims or of Persian or Arab descent, do you socialize with any of your co-workers outside of work? \_\_\_\_\_  
\_\_\_\_\_
- b. If there are any people who are Muslim or of Persian or Arab descent who are living in your neighborhood, do you socialize with them? If so, when is

the last time you were in neighbor's house for a social event? When is the last time a Muslim or person of Persian or Arab descent was at your house for a social event? \_\_\_\_\_  
\_\_\_\_\_

42. Have you had any experience(s) with Muslims, Persians or Arabs that prejudices you against them? \_\_\_ Yes \_\_\_\_\_ No If Yes, please describe your experience(s) and the feelings you have. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

43. Have you had any particularly pleasant experiences with Muslims, Persians, or Arabs, or associated organizations?  
\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ I am not sure

If "Yes" or "I am not sure," please explain:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

44. Do you believe that Muslims, Persians, or Arabs advocate or express violence more than individuals from other religious or ethnic groups?

Yes \_\_\_\_\_ No \_\_\_\_\_ If Yes, what gives you that impression?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

45. Do you have any experiences, feelings or impressions about Arabs, Persians, or Muslims that would make it difficult for you to listen to the evidence with an open mind and render a verdict based solely on the evidence presented in court when the case involves Arab, Persian, or Muslim men charged with various acts of terrorism?

Yes \_\_\_\_\_ No \_\_\_\_\_ If Yes, please explain:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## **MEDIA**

46. What are your primary sources of local and national news? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

47. Do you read a newspaper, magazine, newsletter or web entities regularly (at least two or three times a week)?

Yes \_\_\_\_\_ No \_\_\_\_\_

If Yes, list the names of the newspaper, magazine, newsletter or web entities you read and indicate how often you read each news source.

Name of Media: \_\_\_\_\_  
\_\_\_\_\_ Once a week  
\_\_\_\_\_ 2-3 times a week  
\_\_\_\_\_ More than 4 times a week  
\_\_\_\_\_ Daily Sunday Only

48. Do you watch any television newscasts on a regular basis?

Yes \_\_\_\_\_ No \_\_\_\_\_

a. If Yes, which ones? \_\_\_\_\_

- b. Do you consider the television newscasts you watch to be:

\_\_\_\_\_ always biased  
\_\_\_\_\_ sometimes biased  
\_\_\_\_\_ not at all biased

Please explain the kind of bias you find and any concerns you have about those biases: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

49. Do you ever listen to political commentators on TV or "talk radio?"  
\_\_\_\_\_ Yes \_\_\_\_\_ No If Yes, what station(s) and show(s) do you listen to?  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

50. Do you use the internet as a source of news and information? \_\_\_\_\_ Yes \_\_\_\_\_ No  
If Yes, which web pages do you view? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

51. Do you believe that information that is viewed and read about through the media or television, in newspapers, or on the internet, is protected free speech under the First Amendment of the United States Constitution? \_\_\_\_\_ Yes \_\_\_\_\_ No How do you feel about that? \_\_\_\_\_  
\_\_\_\_\_

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52. Do you have a personal computer at home, or do you have daily access to a personal computer outside your home (e.g. at work, library, etc.)?

\_\_\_\_\_ Yes, I have a computer at home  
\_\_\_\_\_ Yes, I have daily access outside my home  
\_\_\_\_\_ Yes, both  
\_\_\_\_\_ No

How often do you log onto the internet?

\_\_\_\_\_ Several times a day  
\_\_\_\_\_ At least once a day  
\_\_\_\_\_ At least two or three days a week  
\_\_\_\_\_ Once a week or less

How much time do you spend on the internet daily?

\_\_\_\_\_ More than five hours a day  
\_\_\_\_\_ Three to five hours a day  
\_\_\_\_\_ One to three hours a day  
\_\_\_\_\_ Less than one hour per day  
\_\_\_\_\_ Do not spend time on the internet daily

Which of the following activities do you spend the *most* internet time on?

**Please check all that apply:**

\_\_\_\_\_ E-mail/Chatting/Instant messaging  
\_\_\_\_\_ Entertainment (games, cards, puzzles)  
\_\_\_\_\_ Shopping/Auctioning  
\_\_\_\_\_ Stock trading  
\_\_\_\_\_ Banking/Paying bills  
\_\_\_\_\_ Research/Information gathering  
\_\_\_\_\_ Reading the news/Current events  
\_\_\_\_\_ Fantasy sports  
\_\_\_\_\_ Gambling  
\_\_\_\_\_ Downloading music  
\_\_\_\_\_ Blogging  
\_\_\_\_\_ Other: **SPECIFY** \_\_\_\_\_  
\_\_\_\_\_ None

53. Are you, or a member of your family or friends, members of any organization, or a recipient of any e-mail listserves, where you, or your family member or friend, does not agree with every aspect of that organization or Listserv? \_\_\_\_\_ Yes \_\_\_\_\_ No  
If yes, what organization or listserv are your referring to, and why do you, or your

family member or friend, continue to participate in that organization or receive e-mails from that listserv? \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

54. If you are selected as a juror in this case, the government will present evidence, in the form of e-mails sent to a list-serve, photos, and videos which describe and depict fairly gruesome scenes, including dead bodies, and violent events. There is no question that viewing these images, and reading about the events is disturbing. Everyone who sits as a juror is entitled to the utmost respect. It is quite normal for different people to have life experience that would make it particularly difficult for them to review this type of evidence. This Court and the parties do not want to cause anyone any significant discomfort by having to view this type of evidence. Please reflect on this and decide, do you feel that you would be affected by this type of evidence? \_\_\_\_\_ Yes \_\_\_\_\_ No If yes, please state why. \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

#### **TAXES**

55. Have you or your relatives or close friends ever been audited by the Internal Revenue Service? \_\_\_\_\_ Yes \_\_\_\_\_ No If Yes, please explain:

\_\_\_\_\_  
\_\_\_\_\_

56. Have you or your relatives or close friends ever been assessed a penalty by the Internal Revenue Service? \_\_\_\_\_ Yes \_\_\_\_\_ No If Yes, please explain:

\_\_\_\_\_  
\_\_\_\_\_

57. Have you or your relatives or close friends ever been the subject of an Internal Revenue Service or other federal investigation? \_\_\_\_\_ Yes \_\_\_\_\_ No If Yes, please explain:

\_\_\_\_\_  
\_\_\_\_\_

58. Do you prepare your own tax returns? \_\_\_\_\_ Yes \_\_\_\_\_ No

59. Have you ever hired an accountant or other professional to prepare your tax returns? \_\_\_\_\_ Yes \_\_\_\_\_ No

60. Are you self-employed (either full-time or part-time) or run your own business? To those that answer affirmatively:

a. Do you keep your own books and records, or do you hire an accountant?

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b. Do you have any employees? Have you ever had any difficulty with payroll taxes, or with withholding and exemptions for those employees?

\_\_\_\_ Yes \_\_\_\_ No If Yes, please explain:

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c. In general, have you had any difficulties with the Internal Revenue Service in your business? \_\_\_\_ Yes \_\_\_\_ No If Yes, please explain:

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61. Do you have any particular training in or knowledge of accounting methods and procedures? \_\_\_\_ Yes \_\_\_\_ No If Yes, please explain: \_\_\_\_\_

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a. Have you worked for, applied to, or had training with any banking or financial institution? \_\_\_\_ Yes \_\_\_\_ No If Yes, please explain:

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## **WORLD EVENTS**

62. How do you define terrorism? \_\_\_\_\_

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63. How do you define mujahideen? \_\_\_\_\_

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64. Do you believe all mujahideen are terrorists? \_\_\_\_ If so, why? \_\_\_\_\_

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65. Have you followed any criminal cases involving allegations of terrorism or support of terrorism? \_\_\_\_ Yes \_\_\_\_ No If Yes, please list the cases and what was or is of interest to you about these cases. \_\_\_\_\_

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66. Have you or any family members or close friends had any personal experience with acts of terrorism? If Yes, please explain who (relation to you) and circumstances:

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**CASE KNOWLEDGE**

67. Do you know anything about the conflict between Russia and the Chechen people?  
\_\_\_\_ Yes \_\_\_\_ No If yes, what? \_\_\_\_\_

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- a. Would it be difficult for you, as a juror, to listen with an open mind and render a fair and impartial verdict in a case where there will be evidence concerning the Chechen - Russian conflict? \_\_\_\_ Yes \_\_\_\_ No If Yes, please explain:

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68. What have you seen, read or heard about the people and organizations involved in this case?

- a. Pete Seda (Pirouz Sedaghaty): \_\_\_\_\_

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- b. Solomon Al Buthe: \_\_\_\_\_

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- c. Al Haramain: \_\_\_\_\_

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69. The U.S. Government is represented in this case by Assistant U.S. Attorney Charles Gorder and Christopher Cardani. Do you or anyone close to you know or have any connection with either Mr. Gorder or Mr. Cardani?

- \_\_\_\_ Yes \_\_\_\_ No If Yes, please explain: \_\_\_\_\_

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70. Do you or anyone close to you know or have any connection with any of the persons below who will be seated at the counsel table for the U.S. Government? (Please check name and indicate the connection in the space below)

\_\_\_\_\_ IRS Agent Colleen Anderson

\_\_\_\_\_ FBI Agent David Carroll

\_\_\_\_\_  
\_\_\_\_\_

71. Do you or anyone close to you know or have any connection with any of the defense counsel? (Please check name and indicate the connection in the space below)

\_\_\_\_\_ Federal Public Defender Steven T. Wax

\_\_\_\_\_ Lawrence Matasar

\_\_\_\_\_  
\_\_\_\_\_

72. The judge who will preside over this case is The Honorable Michael Hogan of the United States District Court for the District of Oregon. Do you or anyone close to you know or have any connection with Judge Hogan or any of his staff?

\_\_\_\_\_ Yes \_\_\_\_\_ No If Yes, please explain: \_\_\_\_\_

\_\_\_\_\_

73. Have you ever served as a juror? \_\_\_\_\_ Yes \_\_\_\_\_ No If Yes, please check, as appropriate:

\_\_\_\_\_ Civil Date(s): \_\_\_\_\_

Nature of case(s): \_\_\_\_\_

\_\_\_\_\_ Criminal Date(s): \_\_\_\_\_

Nature of case(s): \_\_\_\_\_

\_\_\_\_\_ Grand Jury Date(s): \_\_\_\_\_

Nature of case(s): \_\_\_\_\_

- a. Was there anything about your jury experience that would make it difficult to serve again? \_\_\_\_\_ Yes \_\_\_\_\_ No If Yes, please explain: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

74. Have you ever been employed, appointed, or elected by a court or government agency? If yes, please explain? \_\_\_\_\_

\_\_\_\_\_

75. Have you or anyone close to you worked for, applied to or had training with: (check



all that apply)

- \_\_\_\_\_ a. Any law enforcement, security or investigative agency, including but not limited to the FBI, CIA, INS, NSA, DOD, Department of Homeland Security and the Department of Justice?
- \_\_\_\_\_ b. A prison, jail, detention center or probation services?
- \_\_\_\_\_ c. Any city or town attorney, Attorney General, state or federal prosecutor, or court?
- \_\_\_\_\_ d. Any law firm that practices criminal defense?
- \_\_\_\_\_ e. Any accounting, banking, financial institutions?
- \_\_\_\_\_ f. Any newspaper, radio, television, or other media outlet?

If "Yes" to any of the above, please state who (relation to you), where, when and circumstances.

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76. Are you a vendor or contractor for the United States Government or do work with one? \_\_\_\_ Yes \_\_\_\_ No

77. Have you or anyone close to you ever worked in an effort to change a law or the enforcement of a law?  
Yes \_\_\_\_ No \_\_\_\_ If Yes, please briefly describe that effort and your level of participation: \_\_\_\_\_

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78. Are you or any members of your family or close friends currently, or were formerly, employed by any law enforcement agency or correctional facility? If yes, please explain. \_\_\_\_\_

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79. Have you ever provided any information to the police about any criminal offense? If yes, please explain. \_\_\_\_\_

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If yes, please say whether you did so anonymously. \_\_\_\_\_

80. Do you belong to any neighborhood watch associations? If yes, please explain what you do. \_\_\_\_\_

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81. Do you have any home security system, security bars, guard dog(s), alarms, or weapons for self-protection? \_\_\_\_\_

82. Do you carry any weapons on your person, including mace, guns, or knives? If yes, please explain. \_\_\_\_\_
83. Have you ever testified, watched, or otherwise participated in a court proceeding? If yes, in what court? What were the circumstances? What was your reaction to the experience? \_\_\_\_\_  
\_\_\_\_\_
84. Do you read about, watch, or listen to electronic information about criminal justice issues, including T.V. shows? \_\_\_\_\_
85. Have you or anyone close to you ever been the victim of a crime of violence, reported or not? \_\_\_\_ Yes \_\_\_\_ No If Yes, please state who (relation to you), when and what happened. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- a. Was there an arrest? \_\_\_\_ Yes \_\_\_\_ No
- b. What was the outcome? \_\_\_\_\_  
\_\_\_\_\_
- c. What feelings did you carry away from the experience? \_\_\_\_\_  
\_\_\_\_\_
86. Have you or anyone close to you ever been accused, arrested, charged or convicted of a crime, other than a traffic ticket? \_\_\_\_ Yes \_\_\_\_ No If Yes, please state who (relation to you), when and what happened. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
87. Have you or anyone close to you ever been falsely accused of a crime? \_\_\_\_ Yes \_\_\_\_ No If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
88. How do you feel about the criminal justice system? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
89. Would you always believe a law enforcement officer over other witnesses? \_\_\_\_ Yes \_\_\_\_ No Why or why not? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

90. Under the U.S. Constitution, a person accused of a crime does not have to testify in his defense, and his silence may not be used against him. How do you feel about that? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
91. If a person does not tell his side of the story, do you feel he is more likely guilty? \_\_\_\_\_ Yes \_\_\_\_\_ No Why or why not? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
92. What does the presumption of innocence mean to you? \_\_\_\_\_  
\_\_\_\_\_
93. Do you think that people should be found guilty based on criminal association? If yes, why? If no, why not? \_\_\_\_\_  
\_\_\_\_\_
94. The United States has the burden of proving its case beyond a reasonable doubt. This burden never shifts to the defendant. He is presumed innocent and cannot be convicted unless the jury, unanimously and based solely on the evidence presented in court, decides their guilt has been proved beyond a reasonable doubt. Would you have any difficulty following this rule, where the allegations against the defendant include support of terrorism? \_\_\_\_\_ Yes \_\_\_\_\_ No
95. At the conclusion of this case it is the Court's task and duty to charge you on the law and explain to you the elements of the crimes charged. Do you have any personal, religious, philosophical or other beliefs as to what the law is or should be that would make it difficult for you to follow the instructions of the Court? \_\_\_\_\_ Yes \_\_\_\_\_ No
- a. If the law did not comport with your religious beliefs, could you set aside your religious beliefs and follow the law? \_\_\_\_\_ Yes \_\_\_\_\_ No
96. Is there anything about the nature of the charges in this case that would affect your ability to fairly evaluate the evidence to determine whether or not the prosecution has proven the guilt of the defendant beyond a reasonable doubt? \_\_\_\_\_ Yes \_\_\_\_\_ No  
If Yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
97. Have you consulted with anyone in completing this questionnaire?  
  
Yes \_\_\_\_\_ No \_\_\_\_\_

98. Is there any matter not covered by this questionnaire that you think is important to bring to the attention of the Court? \_\_\_\_ Yes \_\_\_\_ No  
If Yes, please explain: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

### **JUROR'S OATH**

I declare under penalty of perjury that the information, which I have provided in this questionnaire and any attachments, is true and correct. I further declare that my answers are my own, and I have completed this questionnaire without anyone's assistance.

\_\_\_\_\_  
Juror Number

\_\_\_\_\_  
Date

Juror Number \_\_\_\_\_

**Use this space below to complete any answers, preceded by the number of the question.**